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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO.

v.

3-25CR-121 K

VERNIKA TATE (01)

INFORMATION

The United States Attorney charges:

Count One

Conspiracy to Make a False Statement to a Bank
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 1014))

1. In or about June 2020, the defendant, **Vernika Tate**, and others both known and unknown to the United States Attorney, in the Northern District of Texas and elsewhere, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to make a false statement for the purpose of influencing the actions of a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), in violation of 18 U.S.C. § 1014.

Introduction and Parties

2. The defendant, **Vernika Tate**, was a resident of Dallas, Texas, in the Dallas Division of the Northern District of Texas.

3. The Ms. V's Maximum Tax ("MVMT") was a sole proprietorship owned and operated by **Tate**.

4. Regions Bank was a financial institution, the accounts of which were insured by the FDIC.

5. The Paycheck Protection Program (PPP), implemented by the Small Business Administration, was a COVID-19 relief program that, among other things, provided small businesses with forgivable loans to pay for payroll and certain other expenses. Under the PPP, participating third-party lenders approved loan applications and disbursed PPP loans to qualifying businesses.

6. To obtain a PPP loan, a business was required to submit a PPP loan application to a third-party lender. In the PPP loan application, the business was required to state, among other things, the business's average monthly payroll expenses and its number of employees. This payroll information was used to calculate the amount of funds that the business was eligible to receive as a PPP loan.

Object of the Conspiracy

7. It was a part and object of the conspiracy for **Vernika Tate** and her coconspirators to unlawfully enrich themselves by submitting and causing the submission of false and fraudulent applications for PPP loans and using the proceeds of the fraud for their personal use.

Manner and Means of the Conspiracy

8. The manner and means by which the defendants sought to effect the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that **Tate**, conspiring with others, prepared and submitted, and caused to be prepared and submitted, a false and fraudulent

PPP loan application on behalf of MVMT to a financial institution in which she made multiple materially false and fraudulent representations, such as: (i) falsely stating and inflating the business's number of employees; and (ii) misstating and inflating the business's monthly payroll.

b. Additionally, **Tate**, conspiring with others, prepared and submitted, and caused to be prepared and submitted, Internal Revenue Service (IRS) tax documents that were purportedly filed on behalf of him individually and MVMT, including IRS Forms 1040 Individual Income Tax Returns, IRS Forms 940 Employer's Annual Federal Unemployment Tax Returns, and IRS Forms 941 Employer's Quarterly Federal Tax Returns. However, the forms submitted to the financial institution had not been filed with the IRS and contained false information regarding **Tate** and MVMT.

Overt Acts in Furtherance of the Conspiracy

9. In furtherance of the conspiracy and to effect its object, **Tate**, conspiring with others, submitted and caused to be submitted a PPP loan application to Regions Bank, on or about June 15, 2020 on behalf of MVMT, that falsely stated the monthly payroll in order to induce Regions Bank to approve a PPP loan in the amount of \$58,600.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 1014).

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Chad E. Meacham', written over the printed name.

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